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April 8, 2020

Via ECF

Hon. Katherine Polk Failla
United States District Court
Southern District of New York
40 Foley Square, Courtroom 618
New York, NY 10007

Re: Leibowitz, et al. v. iFinex Inc., et al., No. 19-cv-9236 (S.D.N.Y.)

Dear Judge Failla,

Pursuant to Rule 2(D) of the Court's Individual Rules of Practice, we write on behalf of Plaintiffs in the above-referenced action to request an additional 30 days to file Plaintiffs' Consolidated Amended Complaint. Plaintiffs have not previously requested any extensions.

By order dated March 5, 2020, the Court gave Plaintiffs until May 4, 2020, to file a Consolidated Amended Complaint. (ECF No. 99.) Plaintiffs are working diligently to amend their complaint, but have encountered logistical challenges as a result of the COVID virus and respectfully request that the deadline be extended to June 3, 2020.

Plaintiffs have conferred with counsel for the Defendants, and Defendants do not object to this request for an extension. A proposed Revised Scheduling Order is enclosed for the Court's consideration.

Respectfully submitted,

/s/ Caitlin J. Halligan

Caitlin J. Halligan

cc: All counsel of record (via ECF)